

ELLIOTT & ELLIOTT, P.A.
ATTORNEYS AT LAW
721 OLIVE STREET
COLUMBIA, SOUTH CAROLINA 29205
selliott@elliottlaw.us



SCOTT ELLIOTT

TELEPHONE (803) 771-0555
FACSIMILE (803) 771-8010

March 9, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P. O. Drawer 11649
Columbia, SC 29211

RE: South Carolina Electric & Gas Company Annual Review of Base
Rates for Fuel Costs
Docket No. 2005-2-E

Dear Mr. Terreni:

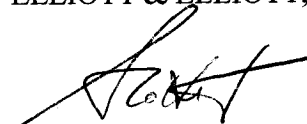
Enclosed please find for filing an original and one (1) copy of the South Carolina Energy Users Committee's First set of Request for Production and Interrogatories together with a Certificate of Service in the above-captioned matter.

I have enclosed an extra copy of these Request for Production and Interrogatories which I would ask you to date stamp and return to me in the self-addressed, stamped envelope provided for your convenience. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me. Thank you.

Sincerely,

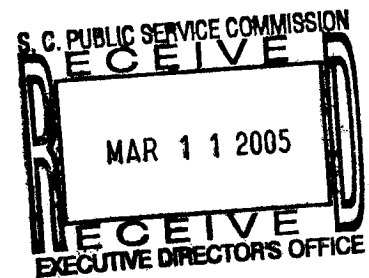
ELLIOTT & ELLIOTT, PA


Scott Elliott

SE/jcl

Enclosures

c: All parties of record w/enc.



STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2005-2-E

IN THE MATTER OF:)	SCEUC'S REQUEST FOR
)	PRODUCTION AND
South Carolina Electric & Gas Company)	INTERROGATORIES
Annual Review of Base Rates for Fuel)	TO SOUTH CAROLINA
Costs)	ELECTRIC & GAS COMPANY

TO: SOUTH CAROLINA ELECTRIC AND GAS COMPANY AND ITS ATTORNEYS, CATHERINE D. TAYLOR, ESQUIRE, MITCHELL M. WILLOUGHBY, ESQUIRE

In accordance with S.C. Code Ann. Regs. R.103-851, and R.103-854, Intervenor, the South Carolina Energy Users Committee ("SCEUC") requests the Applicant, South Carolina Electric and Gas Company ("SCE&G") to respond to the following requests for production of documents and answer the following interrogatories and within ten (10) days from the date of service, under oath, through the individual officers, managing agents, employees, members or representatives who are most knowledgeable with respect to the subject to which each respective interrogatory is addressed:

INSTRUCTIONS

The Intervenor requests SCE&G to serve its responses upon the Intervenor's undersigned counsel not later than ten (10) days after the service hereof. The interrogatories and requests are to be deemed to be of a continuing nature so as to require supplementation and amendment promptly, as necessary, in order to comport with facts and information that is known or available to you at the time of the initial responses of

these interrogatories. With respect to the production of documents, the requested documents should be provided to the Intervenor by delivery to the undersigned at 721 Olive Street, Columbia, South Carolina 29205, or at such other locations as is mutually agreeable to SCE&G and the Intervenor. The documents will be promptly returned after reproduction (if required).

If SCE&G claims a privilege as to any interrogatory or request for production, with respect thereto, set forth the following:

1. Who possess any requested document;
2. Who has reviewed any requested document;
3. The author, recipient and any copyholders of any requested documents;
4. The parties to any covered conversation, if it is a recording or transcript;
5. Who prepared the requested document;
6. The date of the requested document;
7. The type of document; and
8. The type of privilege asserted.

DEFINITIONS

A. As used herein, the term "Document" is used in the broadest sense and includes, but is not limited to, any written, printed, recorded, typed or graphic matter, however produced or reproduced, including all non-identical copies thereof and further including, but not limited to, any books, ledgers, pamphlets, periodicals, brochures, letters, memoranda, advertisements, proposals, telegrams, telexes, reports, telephone logs, drafts, business records, handwritten notes, bill, checks, invoices, charts, graphs, indices, tapes, transcripts, data sheets, records of telephone calls, data processing cards, and

electronically-stored data such as documents stored on network drives, hard drive, cd-rom optical disks, magnetic tape, 3.5 in and 5.25 inch floppy disks, electronic mail files, both current and deleted, and any other computer files of whatever type which are in SCE&G's possession, custody or control.

B. As used herein, the words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and this request any documents which might otherwise be construed to be outside its scope.

C. Wherever applicable, the singular form of a word should be interpreted as plural.

D. As used herein, the word "you" or "your" means or refers to SCE&G, its agents, consultants, or any member, officer or other representative of SCE&G.

As used herein, the word "identify" means provision of dates, times, places, parties to any oral communication. With respect to any other communication, it means the date, length and medium of communication or document. With respect to any person(s), it means name, title, address and telephone number

REQUEST FOR PRODUCTION

1. Please provide all workpapers, in a working Excel spreadsheet complete with all working formulas, supporting Exhibit No. JRH-2. Please be as specific as possible in providing all MWH generation forecasts and all pricing forecasts used in each month noted in Exhibit JRH-2.

2. Please provide all workpapers, in a working Excel spreadsheet complete with all working formulas, supporting Exhibit No. JRH-3. Please be as specific as possible in providing all MWH forecasts and all pricing forecasts used in Exhibit JRH-3.
3. Please provide all workpapers, in a working Excel spreadsheet complete with all working formulas, supporting Exhibit No. JRH-1.
4. To the extent not included above, please provide all workpapers showing exactly how SCE&G allocates fuel costs associated with generation units that are partially owned by parties other than itself.
5. Please provide a list of all coal contracts included in SCE&G's coal portfolio. Please provide the following details of each contract: amount of coal to be delivered every month; quality aspects of coal (e.g. sulfur content, etc.); price of coal per ton per contract for each month in the forecasted test year; and a summary cost of coal for each month in the forecasted test year. In responding to this request, it is not necessary to identify any party to any such contract other than the identity SCE&G, SCANA, or any subsidiary of SCANA.
6. Please provide the calculations and/or worksheets used to calculate and/or determine the average cost in dollars per MMBTU for coal purchased in March 2004 through January 2005 as identified and set out in Exhibit No. GH-1.
7. Please provide copies of any documents used in preparing responses to these interrogatories or request to produce.

INTERROGATORIES

1. Does SCE&G hedge its purchase of natural gas for use in electric generation? If so, please provide a written explanation of the hedging program as well a dollar cost of such hedging program.
2. If SCE&G does hedge its procurement of natural gas, please provide the name of the entity that the Company employs to hedge its natural gas procurements.
3. Please provide an explanation as to how the Company developed its monthly total systems sales.
4. To the extent not provided in response to the above-stated request for production, what is the monthly coal forecast price, in dollars per ton and dollars per MMBTU, used in line no. 1 of Exhibit JRH-2?
5. To the extent not provided in response to the above-stated request for production, what is the monthly natural gas price forecast used in line no. 1 of Exhibit JRH-2?
6. To the extent not provided in response to the above-stated request for production, what is the monthly nuclear fuel price forecast used in line no. 1 of Exhibit JRH-2?
7. To the extent not provided in response to the above-stated request for production, what is the monthly fuel oil price forecast used in line no. 1 of Exhibit JRH-2?
8. To the extent not provided in response to the above-stated request for production, what are the monthly fuel costs associated with purchased power that is embedded in Exhibit JRH-2?
9. To the extent not provided in response to the above-stated request for production, what are the monthly purchased power costs embedded in Exhibit JRH-2?

10. Who is the natural gas marketer for SCE&G in its procurement of natural gas for electric generation needs? Please provide a detailed explanation of exactly how this marketer is compensated and how SCE&G assures consumers that it is getting the best available price.
11. Convert the cost of coal measured in dollars per million BTUs set out in Exhibit No. GH-1 into cost measured in dollars per ton. Identify all calculations and workpapers necessary to answer this interrogatory.
12. Set out and identify the formula or calculations used to convert the cost of coal measured in dollars per million BTUs into the cost measured in dollars per ton.
13. Please provide freight costs per ton for each coal contract provided and/or identified in response to request to produce No. 5.
14. Please provide the nuclear capacity factor assumed for each month in Exhibit JRH-2. If SCE&G is expecting a refueling outage in 2005, please provide the expected date and duration of this outage.
15. Assuming that SCE&G recovers its full request in this case, please provide annual cost impacts on the following sample industrial consumers:

Rate 23					
MW Load	Assumed Load Factors				
	60.0%	70.0%	80.0%	90.0%	100.0%
5					
10					
15					
20					

In the above table, please provide the dollar increase as well as the percentage increase for each sample customer.

16. Assuming that SCE&G recovers its full request in this case, please provide annual cost impacts on the following sample industrial consumers:

Rate 24					
MW Load	Assumed Load Factors				
	60.0%	70.0%	80.0%	90.0%	100.0%
5					
10					
15					
20					

In the above table, please provide the dollar increase as well as the percentage increase for each sample customer

17. Identify all documents used in responding to these interrogatories



Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205
803-771-0555
803-771-8010

Attorney for South Carolina Energy
Users Committee

March 9, 2005

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Electric & Gas Company Annual Review of
Base Rates for Fuel Costs

DOCKET NO.: 2005-2-E

PLEADING: SOUTH CAROLINA ENERGY USERS COMMITTEE'S
REQUEST FOR PRODUCTION AND
INTERROGATORIES TO SOUTH CAROLINA
ELECTRIC & GAS COMPANY

PARTIES SERVED:

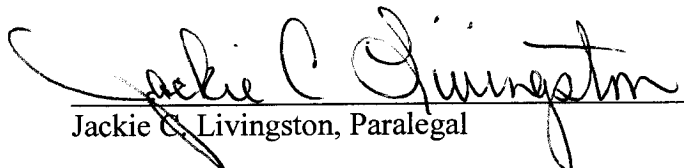
Catherine D. Taylor, Esquire
SCANA Corporation
Legal Department
Columbia, SC 29218

John F. Beach, Esquire
Ellis Lawhorne & Sims, P.A.
1501 Main St., 5th Floor
Columbia, SC 29201

Damon E. Xenopoulos, Esquire
Brickfield Burchette Ritts & Stone, PC
1025 Thomas Jefferson Street, NW
8th Floor
Washington, DC 20007

Florence P. Belser, Esquire
ORS
P. O. Box 11263
Columbia, SC 29211

March 9, 2005


Jackie C. Livingston, Paralegal

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by hand delivery on the date indicated below:

RE: South Carolina Electric & Gas Company Annual Review of
Base Rates for Fuel Costs

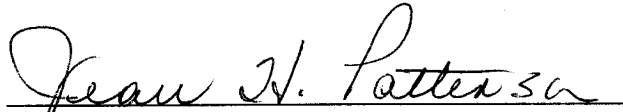
DOCKET NO.: 2005-2-E

PLEADING: SOUTH CAROLINA ENERGY USERS COMMITTEE'S
REQUEST FOR PRODUCTION AND
INTERROGATORIES TO SOUTH CAROLINA
ELECTRIC & GAS COMPANY

PARTIES SERVED:

Mitchell M. Willoughby
Willoughby & Hoefer, P.A.
1022 Calhoun Street, Ste. 302
Columbia, SC 29202

March 9, 2005


Jean H. Patterson